Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Application of Open Network Architecture and Nondiscrimination Safeguards to GTE Corporation	)	CC Docket No. 92-256

To: The Common Carrier Bureau

GTE's OPEN NETWORK ARCHITECTURE PLAN

GTE Service Corporation and its affiliated domestic telephone operating companies

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I. INTRODUCTION

GTE supports in principle the concept of open access to network functionality, including parity in prices and technical quality between affiliated and non-affiliated enhanced service providers ("ESPs"). GTE also supports the concepts of Comparably Efficient Interconnection ("CEI") and Open Network Architecture ("ONA") as ways to allow the competitive provision of innovative new services, thereby increasing the aggregate telecommunications market. In this filing GTE demonstrates its commitment to continuing to meet evolving customer needs by offering enhanced services and restructuring tariffs in order to provide competitive exchange network access to unaffiliated parties under the same terms and conditions as apply to enhanced services furnished by affiliated parties.

Furthermore, GTE intends to encourage the development and implementation of a broad array of modern and efficient telecommunications services that will be widely available to the public. In this way, GTE will advance the establishment of a competitive marketplace for enhanced services while protecting the ratepayer from being obliged to "subsidize" ONA-related services.

II. BACKGROUND

In December 1992, the Commission released a Notice of Proposed Rulemaking[1] proposing to apply to GTE Corporation ("GTE") the same regulatory framework of Open Network Architecture and nondiscrimination safeguards that apply to the Bell Operating Companies ("BOCs").[2] Following extensive submissions, the FCC's "*GTE ONA Order*" released April 4, 1994 applies to GTE specified ONA requirements and nondiscrimination safeguards.[3] This Plan is filed in compliance therewith, specifically in compliance with the requirement[4] that GTE must file an ONA plan nine months from release of the *GTE ONA Order*, and as a step to compliance with the requirements that GTE must file federal and state ONA tariffs three months later, and implement ONA requirements and nondiscrimination safeguards fifteen months after release of the *GTE*

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1 *Application of Open Network Architecture and Nondiscrimination Safeguards to GTE Corporation*, CC Docket No. 92-256 ("D.92-256"), Notice of Proposed Rulemaking, 7 FCC Rcd 8664 (1992) (the "*D.92-256 NPRM*").

2 *Filing and Review of Open Network Architecture Plans*, CC Docket No. 88-2 ("D.88-2"), 4 FCC Rcd 1 (1988) ("*BOC ONA Order*"), *reconsideration*, 5 FCC Rcd 3084 (1990) ("*BOC ONA Reconsideration Order*"), *further order*, 5 FCC Rcd 3103 (1990) ("*BOC ONA Amendment Order*"), Erratum, 5 FCC Rcd 4045,, *petitions for review denied sub nom. California v. FCC*, 4 F.3d 1505 (9th Cir. 1993), *modified*, 6 FCC Rcd 7646 (1991) ("*BOC ONA Further Amendment Order*"), *petition for review pending sub nom. MCI Telecommunications Corp. v. FCC*, No. 92-70189 (9th Cir. filed February 19, 1992), *modified*, 8 FCC Rcd 97 (1993) ("*BOC ONA Amendment Reconsideration Order*").

3 D.92-256, Report and Order, 9 FCC Rcd 4922 (1994) (the "*GTE ONA Order*").

4 *GTE ONA Order*, 9 FCC Rcd at 4923.

ONA Order. In accordance with the *GTE ONA Order*, GTE has developed this Plan based on approved BOC plans.[5]

Following is GTE's Plan filed in compliance with the *GTE ONA Order*.

III. GTE's ONA SERVICES

A. Identification of Initial ONA Services

The BOCs were instructed to interact with the ESP industry segment to determine their needs as part of the development of their ONA Plans. In this connection, extensive research activities were conducted by the BOCs and Bellcore to identify ESP needs. These efforts included national and regional ONA public forums to obtain ESP input and BOC presentations of their plans, market research activities by both the BOCs and external research firms, personal interviews, and Ad Hoc Committees made up of the BOCs and Bellcore. The results of these activities, as documented in the various BOC ONA Plan filings, proved to be very beneficial to GTE in identifying the utility of the various services to ESPs and the potential demand and technical feasibility of the services.

To formulate GTE's initial ONA services listed below, GTE has taken the documented information generated by the BOC ONA Plans, survey information obtained by GTE, input from participation at the Information Industry Liaison Committee

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[5] GTE's Plan filing is simplified in accordance with the *GTE ONA Order*, 9 FCC Rcd at 4937: "We do not require that GTE detail these measures in the ONA plan it must submit to the Commission as long as GTE's ONA program follows specific procedures approved for the BOCs and is consistent with requirements set out in the *ONA* orders." *Footnote omitted. See also id.* at 4942 n.87; 4945 n.98; 4947 n.109; and 4948 n.117. References to approved BOC procedures are contained within the sections of GTE's Plan and copies of the referenced pages are contained in the appendix section of the Plan.

("IILC"), ONA services usage reports filed by the BOCs, and informal interviews with the BOCs.

GTE is currently assessing the feasibility of offering two additional services that have been requested by ESPs both at the IILC and of GTE directly.[6] GTE will employ its revised new service request process (*see* Section III. D. below) to assess any additional ONA services desired by ESPs that are not included in this Plan.

B. Proposed Initial ONA Service Offerings

The BOCs developed a common ONA framework as part of the national effort to achieve consistency in their approach to ONA. Such uniformity was requested by the ESPs and a common ONA model was developed. The model is technologically flexible and describes the generic elements of any ONA connection to the network. The ONA model consists of several basic service arrangements ("BSAs"), which are the fundamental means by which ESPs obtain network services. Within each BSA, ESPs may subscribe to optional basic service elements ("BSEs"), which are individual network functions offered to meet specific ESP needs. Subscribers also have available complementary network services ("CNSs"), which are the means by which end users reach ESPs. GTE's ONA services will follow this common ONA model.

1. Basic Serving Arrangements or BSAs

A BSA is the fundamental underlying connection of an ESP to and through GTE's network. It is comprised of an ESP link, the features/functions associated with that access link at the central office serving the ESP and/or other

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[6] These services were evaluated at the IILC as Issue #036, "Local Calling Area Abbreviated Dialing Access to Information and Enhanced Services", and Issue #042, "Call Transfer for ESP Lines with Called Number Identification".

offices, and the transport (dedicated or switched) within the network that completes the connection from the ESP to the central office serving its customer or to capabilities associated with the customer's complementary network services. Each component may have a number of categories of network characteristics. Within these categories of network characteristics are alternatives from which the customer must choose. Examples of such alternatives include, but are not limited to, an ESP Access Link, features/functions, and transport/usage. GTE's BSAs fall into the following four categories: (1) Circuit Switched; (2) Packet Switched; (3) Dedicated; and (4) Dedicated Network Access Link.

GTE plans to offer the following 13 BSAs:

(Generic BOC ONA Services User Guide names)

C1 Type A - Circuit Switched Line
C1 Type B - Circuit Switched Trunk
C2 Type A - X.25 Packet Switched
C2 Type B - X.75 Packet Switched
C3 Type C - Dedicated Voice Grade
C3 Type D - Dedicated Program Audio
C3 Type E - Dedicated Video
C3 Type F - Dedicated Digital (<64kbps)
C3 Type G - Dedicated High Capacity Digital (1.544Mbps)
C3 Type H - Dedicated High Capacity Digital (>1.544Mbps)
C3 Type I - Dedicated Alert Transport
C3 Type K - Dedicated Digital (64kbps)
C4 - Dedicated Network Access Link

GTE's technical references, switch generics, product names, and tariff references for the BSAs will be included in GTE's ONA Services User Guide to be filed September 1995.

2. Basic Service Elements or BSEs

A BSE is an optional network capability associated with a BSA. While a customer must subscribe to at least one of the BSA alternatives within a category of network characteristics, BSEs constitute optional capabilities to which the customer may decline to subscribe.

GTE plans to offer the following 29 BSEs:

(Generic BOC ONA Services User Guide names)

Fast Select Acceptance - Packet
Fast Select Request - Packet
Access To Clear Channel Transmission
Automatic Protection Switching
Bridging
Conditioning
Data Over Voice (DOV) Service
Secondary Channel Capability
Alternate Routing
Called Directory Number Delivery via DID
Calling Billing Number Delivery - FG B Protocol
Calling Billing Number Delivery - FG D Protocol
Calling Directory Number Delivery - via ICLID
Carrier Selection On Reverse Charge
Message Desk (SMDI)
Message Waiting Indicator - Activation (Audible)
Multiline Hunt Group
Multiline Hunt Group - Uniform Call Distribution Line Hunting
Multiline Hunt Group - UCD With Queuing
Three Way Call Transfer
Uniform 7 Digit Access Number - Remote Call Forwarding
Route Diversity

(Region-Specific BOC ONA Services User Guide names)

Third Number Billing Inhibited
Multiplexing - Digital
Inband Signaling

High Capacity Digital Hand-Off Service

(GTE Product Names Not Contained in BOC ONA Services User Guide)

Priority - Packet Switched Network Supplemental Feature
MegaConnect Service (SMDS)
MWI - Activation (Audible Ring Burst)

GTE's technical references, switch generics, product names, and tariff references for the above BSEs will be included in GTE's ONA Services User Guide to be filed September 1995.

3. Complementary Network Services or CNSs

CNSs typically are applied to the end user's line to facilitate ESP provision of enhanced services to end users, and are offered to end users rather than to ESPs. CNSs are essentially local services that are today tariffed within state general exchange service tariffs.

GTE plans to offer the following 42 CNSs:

(Generic BOC ONA Services User Guide names)

Call Detail Recording Reports - Packet
Fast Select Acceptance - Packet
Fast Select Request - Packet
Derived Channels (Monitoring)
Automatic Callback
Automatic Recall
Call Forwarding - Busy Line Intraswitch
Call Forwarding - Busy Line Interswitch
Call Forwarding - Busy/Don't Answer - Customer Control of Activation/Deactivation
Call Forwarding - Busy/Don't Answer - Customer Control of Forward-to Number
Call Forwarding - Don't Answer Intraswitch
Call Forwarding - Don't Answer Interswitch
Call Forwarding - Multiple Simultaneous Calls Interswitch
Call Forwarding - Variable
Call Forwarding - Variable - Activation without Courtesy Call

Call Forwarding - Variable - Remote Activation/Control
Call Waiting - Cancel
Calling Directory Number Delivery - via ICLID
Customer Originated Trace
Distinctive Ringing
Distinctive Ringing - Terminating Screening
Hot Line
Message Waiting Indicator (MWI) - Ability To Receive Audible Message Waiting
Selective Call Forwarding
Selective Call Rejection
Speed Calling

(Region-Specific BOC ONA Services User Guide names)

Call Waiting
Three Way Calling
Remote Call Forwarding
Call Forwarding - Busy Line/Don't Answer
Third Number Billing Inhibited

(GTE Product Names Not Contained in BOC ONA Services User Guide)

Busy Number Redial
Saved Number Redial
Last Number Redial
Call Forwarding - Fixed
Special Call Waiting
Special Call Acceptance
Anonymous Call Rejection
Call Restriction Service
MWI - Ability To Receive Audible Ring Burst
GTE Dial DataLink Service
Customer Controllable Ringing

GTE's technical references, switch generics, product names, and tariff references for the above CNSs will be included in GTE's ONA Services User Guide to be filed September 1995.

4. Ancillary Network Services or ANSs

ANSs are optional services available to ESPs to support/complement their provision of enhanced services. ANSs are not necessarily associated with an ONA Access Arrangement, and in some cases do not require the technical interconnection to the network that is essential to the operability and utility of BSAs and BSEs. Additionally, the Commission has made clear that basic ONA-related services (*i.e.*, BSAs and BSEs in the ONA Model) must be offered on a tariffed basis. Consequently, detariffed services cannot be considered BSAs or BSEs. Thus, if a capability is detariffed or is not directly related to the technical operation of a BSA, it falls within the ANS category.

GTE's initial ANS offering is:[7]

Detailed Billing Service

C. Uniformity

Following is a comparison of the quantity of GTE's initial ONA services with those identified in the July 1994 ONA Services User Guide of each BOC:[8]

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[7] As previously listed *supra*, GTE will provide the following ONA services that will provide network information that may be useful to ESPs in billing their customers: 1) Called Directory Number Delivery via DID; 2) Calling Billing Number Delivery - FG B Protocol; 3) Calling Billing Number Delivery - FG D Protocol; 4) Calling Directory Number Delivery - via ICLID; 5) Message Desk ("SMDI"); and 6) Call Detail Recording Reports - Packet.

[8] A detailed comparison is contained in Appendix A.

Company	BSAs	BSEs	CNSs
Ameritech	21	45	26
Bell Atlantic	22	43	28
BellSouth	20	52	60
NYNEX	18	50	48
Pacific Bell	19	34	26
SWBT	13	29	23
US West	18	57	36
GTE	13	29	42

GTE believes that the IILC is an excellent industry forum to discuss ONA services uniformity that would be useful to ESPs. GTE has participated at the IILC since 1987 and has a representative that currently serves as the Local Exchange Carrier ("LEC") Co-Chair of the Interindustry Advisory Group (*i.e.*, the administrative body of the IILC), has served as LEC Co-Champion of one closed Issue,[9] currently serves as LEC Co-Champion of one active Issue,[10] and participates on the task groups of all currently active issues.[11] GTE will continue its active participation at the IILC in the interests of industry uniformity and in compliance with the *GTE ONA Order*.

D. New Service Requests

GTE will revise its current new service request process that was implemented based upon the resolution of IILC Issue #022, "Unbundling Criteria."[12] GTE has used

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[9] Issue #040, "Abbreviated Call Forwarding Activation."

[10] Issue #045, "Series Circuits on Selected Telemessaging Subscribers."

[11] Issue #026, "Long Term Unbundling and Network Evolution"; Issue #038, "Call Forwarding Control Capabilities for End-Users and ESPs"; Issue #041, "Delivery of Billing Information and Called Number Using Non-Access Dialing Plan"; Issue #044, "Advanced Intelligent Network (AIN) Access by Non-LEC Resource Element"; Issue #046, "Delivery of Intra-LATA (NPA) 555-XXXX Dialed Calls To Service Provider"; Issue #047, "Call Forward - Transfer Back"; Issue #048, "Client Controlled Call Screening of a Forwarded Call."

[12] As of the date of this filing, GTE has not received any completed new service requests since the process was implemented in 1992.

the recommended forms and analysis criteria contained in the IILC documentation (as noted in the Issue 022 close out document, at 10 n.3 dated September 12, 1991). The criteria recommended in this IILC Issue included: Utility to the ESP, Technical Feasibility, Economic Feasibility, Regulatory Feasibility, Legal Feasibility, LEC Public Policy Feasibility, and Other. (This comprises three additional criteria beyond those the Commission has applied to the BOCs in their 120-day process). Even though the recommended response timeframe for the analysis in Issue #022 was six months[13], GTE's internal response guideline was set at 120 days. GTE will revise its current process, based upon the *GTE ONA Order*, to limit the analysis criteria to the Commission's four criteria[14] and will make market demand a "required" versus "optional" input. GTE will revise its process to be in compliance with the ONA plan already approved for BellSouth (*see* Appendix B). GTE will follow the same 120-day new service request process, but will not employ the same organizational structure as identified in the BellSouth plan.

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[13] The extended timeframe for LEC response was because some of the requests were not specific and because the submission of market demand by the requester is optional.

[14] The FCC recognizes four criteria: market demand, cost feasibility, technical feasibility, and utility as perceived by ESPs. These are recognized as the critical factors that determine whether a service is likely to be a viable offering. *BOC ONA Order*, 4 FCC Rcd at 207.

IV. COMPLIANCE WITH COMPARABLY EFFICIENT INTERCONNECTION OR CEI PRINCIPLES

A. Interface Functionality

This CEI parameter requires that GTE "make available standardized hardware and software interfaces that are able to support transmission, switching, and signaling functions identical to those utilized" by GTE's enhanced service.[15]

GTE previously implemented the requirements of this CEI parameter upon the deployment of GTE's initial enhanced service in 1990. GTE's practices comply with the ONA plan already approved for SWBT (*see* Appendix C).

B. Unbundling

This CEI parameter requires that basic service functions that underlie GTE's enhanced services "be unbundled from other basic service offerings and associated with a specific rate element in the CEI tariff."[16]

GTE previously implemented the requirements of this CEI parameter upon the deployment of GTE's initial enhanced service in 1990. All underlying network functionality utilized by GTE's enhanced services have been unbundled and tariffed and are available to all ESPs on the same terms and conditions. GTE's practices comply with the ONA plan already approved for Pacific Bell (*see* Appendix D).

C. Resale

This CEI parameter requires GTE's ESP to take the underlying basic services at their unbundled tariffed rates.[17]

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[15] *Amendment of Sections 64.702 of the Commission's Rules and Regulations (Third Computer Inquiry)*, Report and Order, 104 F.C.C. 2d 958, 1039 (1986) ("*Phase I Order*") (*subsequent citations omitted*).

[16] *Phase I Order*, 104 F.C.C. 2d at 1040.

GTE previously implemented the requirements of this CEI parameter upon the deployment of GTE's initial enhanced service in 1990. GTE's enhanced service operation obtains the underlying basic services at their tariffed rates and accounts for the expenses via allocations per GTE's Cost Allocation Manual ("CAM") approved by this Commission. GTE's practices comply with the ONA plan already approved for NYNEX (*see* Appendix E).

D. Technical Characteristics

As part of its ONA offering, GTE must provide the underlying basic services to competing ESPs "with technical characteristics that are equal to those of the basic services [used by GTE] for its own enhanced services."[18]

GTE previously implemented the requirements of this CEI parameter upon the deployment of GTE's initial enhanced service in 1990. GTE's practices comply with the ONA plan already approved for Ameritech (*see* Appendix F).

E. Installation, Maintenance, and Repair

This CEI parameter requires that the time periods for installation, maintenance and repair of the basic services and facilities included in an ONA offering must "be the same as those the carrier provides to its own enhanced service operations."[19]

GTE previously implemented the requirements of this CEI parameter upon the deployment of GTE's initial enhanced service in 1990. GTE's practices comply with the

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[17] *Id.* at 1040.

[18] *Id.* at 1041.

[19] *Id.*

ONA plan already approved for Ameritech (*see* Appendix G). A detailed description of GTE's current processes is provided in Section V.D. below.

F. End User Access

This CEI parameter requires that, as to end users who access or activate a GTE enhanced service in a particular manner (*e.g.*, abbreviated dialing, signaling or derived channels), GTE provides "as part of [its] CEI offering the same capabilities to end-users of all enhanced services that utilize the carrier's facilities."[20]

GTE previously implemented the requirements of this CEI parameter upon the deployment of GTE's initial enhanced service in 1990. All end-users of enhanced services can obtain the same capabilities used by customers of GTE's enhanced services via tariff. GTE's practices comply with the ONA plan already approved for NYNEX (*see* Appendix H).

G. Availability of CEI

The Commission requires that CEI must "be fully operational and available on the date that [a carrier] offers its corresponding enhanced services to the public."[21]

GTE previously implemented the requirements of this CEI parameter upon the deployment of GTE's initial enhanced service in 1990. All underlying network functionality utilized by GTE's enhanced service was operational and available via tariff at the time GTE began offering its enhanced service. GTE's practices comply with the ONA plan already approved for NYNEX (*see* Appendix I).

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[20] *Id.*

[21] *Id.*

H. Minimization of Transport Costs

Under this CEI parameter, carriers must provide ESPs with "facilities that minimize their transport costs."[22] Loop or trunk multiplexing and colocation are suggested by the Commission as ways in which a carrier can minimize an ESP's transport costs. GTE has complied with this CEI parameter even though GTE does not allow unaffiliated ESPs to colocate their equipment in the GTE central office. GTE has provided a kind of "virtual colocation" arrangement for ESPs via price parity. GTE's enhanced service operation purchases all interconnection arrangements from the tariff and if any of the underlying facilities are distance sensitive, GTE pays the tariffed rate as if located two miles from the central office. GTE offers multiplexing, via existing tariffs, that may be employed by competing ESPs to minimize their transport costs.

GTE previously implemented the requirements of this CEI parameter upon the deployment of GTE's initial enhanced service in 1990. GTE's practices comply with the ONA plan already approved for Ameritech (*see* Appendix J).

I. Recipients of CEI

This CEI parameter requires that carriers "not restrict the availability of CEI to any particular class of customer or enhanced service competitor."[23]

GTE previously implemented the requirements of this CEI parameter upon the deployment of GTE's initial enhanced service in 1990. All underlying tariffed services are generally available to all ESPs and users without restrictions to the identity of the user. Consequently, CEI will, by definition, be available to all unless there are state-

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[22] *Id.* at 1042.

[23] *Id.*

mandated customer or use restrictions included in its respective state tariffs. GTE's practices comply with the ONA plan already approved for Ameritech (*see* Appendix K).

V. COMPLIANCE WITH NON-DISCRIMINATION SAFEGUARDS

A. Customer Proprietary Network Information ("CPNI")

1. Individual CPNI

GTE defines Customer Proprietary Network Information or CPNI as the individual[24] customer data accumulated by telephone companies in the course of furnishing regulated common-carrier services to the customers. This type of information would include: type and quantity of regulated services purchased, repair information, traffic studies, usage data, customer calling patterns and station message detail recording ("SMDR") information. CPNI does not include the information found in telephone directories (*i.e.*, customer name, address, and telephone number), information regarding unregulated customer services and equipment, and credit information.

GTE's proposed CPNI multi-line business customer (*i.e.*, those with two-to-twenty access lines) annual notification letter and response form are included in Appendix L. GTE does not conduct outbound telemarketing efforts for any of its services to customers that have subscribed to non-listed and non-published telephone service. Direct mail promotional materials for any GTE service, including enhanced services, may be sent to all customers including those with non-listed and non-published telephone service.

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[24] "Aggregate CPNI" is dealt with *infra*.

GTE's systems cannot currently restrict access to or blank the fields that contain the forward-to numbers of customers that have the number pre-programmed into the network via service order. The actual forward-to number is maintained in the customer's record and could be accessed by a representative that can market enhanced services. Prior to the implementation of GTE's password protection system, GTE will automatically restrict the CPNI of customers that subscribe to this form of fixed call forwarding. Also, prior to the implementation of GTE's password protection system, GTE will continue to employ its "flagging" process to identify restricted CPNI accounts. Access to restricted customer accounts is only allowed to representatives that do not proactively market enhanced services. GTE's representatives that handle restricted accounts will be allowed to process orders for enhanced services only when the customer initiates the request.

GTE will obtain authorization to use the CPNI from customers with more than twenty lines in compliance with the *GTE ONA Order*.

GTE will revise its CPNI practices by July 1995 and will comply with the ONA plan already approved for Ameritech (*see* Appendix M).

2. Aggregate CPNI

GTE defines "aggregate CPNI" as non-customer specific statistical information describing the CPNI characteristics of customer groups or market areas. GTE does not currently provide aggregate CPNI to its enhanced services operation. If GTE decides to do so in the future, it will not compromise the proprietary interests of customers and will act in compliance with the ONA plan already approved for Ameritech (*see* Appendix N).

3. Password ID System Requirements

GTE was ordered to implement a password ID system by April 4, 1996 as a replacement to its current approach of flagging records.[25] In the BOC ONA orders, the Commission staff indicated a preference for NYNEX's plan in this regard. GTE will implement its password ID system in compliance with the approved NYNEX plan (*see* Appendix O).

B. Operations Support Systems ("OSS")

GTE currently provides the same "form of access" to its operations support systems or OSS for its enhanced services group as it does for unaffiliated ESPs in compliance with the FCC's direction:

> In addition, we clarify the OSS same access requirement for OSS services related to BSAs and BSEs. **Orders for OSS services with respect to BSEs and BSAs used for BOC enhanced services must be received and processed by the BOC in the same ways as orders for OSS services for BSEs and BSAs coming from ESPs.** If ESPs can use a gateway or call in an order to the business office or repair service, BOC enhanced services may have only the same options. BOC integrated and network personnel, such as business office or repair office personnel, may then directly access OSS to process orders for both the BOC and independent ESP enhanced services.[26]

Currently, all installation and repair orders for network services used by GTE and by unaffiliated ESPs, including all network services identified as BSAs and BSEs used by GTE's enhanced services, are processed in compliance with the above ordering paragraph.

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[25] *GTE ONA Order*, 9 FCC Rcd at 4945: "We have previously rejected as insufficient GTE's approach of flagging records. Accordingly, we require that GTE comply with the same CPNI requirements established for the BOCs within fifteen months of the release date of this Order." *Footnotes omitted. See also id.* at 4945 n.96 and n.97.

[26] *BOC ONA Amendment Reconsideration Order*, 8 FCC Rcd at 98. *Footnote omitted, emphasis added.*

GTE has yet to see any market demand for "direct" access to OSS. Two Issues at the IILC on this subject matter resulted in no conclusive demand for direct access by ESPs.[27] In Issue #003, completed in February 1990, the IILC found that there are several existing methods of delivering information from BOC OSSs to users (*e.g.*, paper, magnetic tape, and electronic data link) that are useful for specific applications and do not require elaborate, new provisioning efforts. Also, the IILC found that some sort of secure generic software gateway interface to the various BOCs' OSSs appeared to be the most feasible long term solution but that the interface needed to be based upon T1M1[28] standards yet to be developed.

Most recently in Issue #039, completed in September 1994, the IILC recommended that based on the low industry response rate and the lack of consistent information from IILC participating ESPs regarding their needs for access to OSS capabilities for end user CNSs, the IILC should not pursue methodology to provide such access on a Task Group basis. The IILC also recommended that ESPs with an interest in access to OSS capabilities for CNSs should contact the appropriate LEC.

If GTE decides to provide direct access to OSS for its ESP, or if requests from unaffiliated ESPs meet the Commission's assessment criteria for ONA services,[29] then

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[27] Issue #003, "ESP/Customer Access to BOC Network Management Systems; and Issue #039, "ESP Needs for OSS Capabilities Associated with End-User Complementary Network Services.

[28] Subcommittee of the Alliance for Telecommunications Industry Solutions ("ATIS") Standards Committee T1-Telecommunications, which addresses issues surrounding Internetwork Planning/Engineering and Testing as well as Operations Systems and Protocols.

[29] As noted supra, the FCC recognizes four criteria: market demand, cost feasibility, technical feasibility, and utility as perceived by ESPs. *BOC ONA Order,* 4 FCC Rcd at 207.

GTE will develop, provision, and tariff such access in accordance with the CEI principles of this plan.

C. Network Information Disclosure

By July 1995, GTE will implement network information disclosure practices that will comply with the *GTE ONA Order*. Under the Commission's rules, GTE will disclose the relevant network information (1) to an ESP at the "make/buy point," subject to the ESP's execution of a nondisclosure agreement, and (2) to the public between from six and twelve months before introduction of the new or modified network service. GTE will comply with the ONA plan already approved for Ameritech (*see* Appendix P).

D. Nondiscrimination in Installation and Maintenance

With the exception of support system names, GTE's procedures for installation and maintenance of network services are virtually identical to those described by Ameritech in its ONA Plan. Available circuits and equipment are assigned on a "first-come, first-served" basis through highly mechanized procedures that neither depend on, nor are affected by, whether a particular customer is an affiliated or nonaffiliated ESP. The circuit assignment systems do not contain information regarding the identity of customers, and GTE will make no effort during the actual facilities and equipment assignment process to determine whether a particular ordering customer is an ESP. The systems are blind to the use that a customer will make of particular facilities and equipment. Many enhanced services will rely on basic network services that are no different from those used by other customers. GTE's testing procedures are designed to assure that circuits meet tariffed standards. They are not set up to provide, and generally do not contain, any information related to the relative quality of available facilities and equipment.

The provisioning process begins when a customer contacts GTE to request a service. ESPs will use the same ordering channels as all other customers, and will obtain ONA and existing basic services from the same centers used by other customers.

BSAs, BSEs and CNSs provided by GTE will be made available to all prospective users in a non-discriminatory fashion. Although customers identify themselves by name and address when ordering services, this information is used only -- and is necessary for this purpose -- to enable GTE to facilitate maintenance and billing functions. Nonaffiliated ESPs will not be asked to identify themselves as such during the ordering process, and no special identification will be added to their records should they choose to indicate their line of business.

The availability of contact personnel and the manner in which those personnel process orders will be identical for all similarly situated customers, regardless of business affiliation. Requests for services may be transmitted orally or in written form. Mechanized customer order input alternatives are under consideration to satisfy ESP capability requests and to handle potential order volume increases.

Since billing cannot take place until order completion, GTE has an economic incentive to complete orders for all customers -- regardless of their business affiliation -- in a timely fashion. All requests for service are handled on a "first-come, first-served" basis. Contact personnel are responsible for provisioning network service to all customers in accordance with stringent corporate standards for accessibility, accuracy, helpfulness, timeliness of contact and timeliness of order processing.

Due date intervals are assigned in accordance with corporate standards and are the same for all customers requesting similar types and quantities of services. For